Data Submitted (UTC 11): 1/6/2024 4:38:33 PM First name: Sierra Last name: Rad Organization: Title: Comments: To Whom it may concern:

My comments here are regarding draft policies that would make fixed anchors (bolts, pitons, slings) prohibited in America's Wilderness areas. As a canyoneer, caver, climber, and search and rescue volunteer, I oppose these new policies that will classify fixed anchors as "prohibited installations" in Wilderness areas. This new classification hinders wilderness exploration, threatening the existence of longstanding established routes, and obstructing climbers' ability to replace old, unsafe bolts. It would be counter productive and threaten decades of sustainable climbing and the public's right to responsibly enjoy America's wilderness.

As a Search and Rescue volunteer, I can see these proposals put the safety of the community at risk, potentially leading to more rescues for reasons below. As a canyoneer, I was in a situation once where a fixed anchor allowed me to self-rescue myself and two of my friends after a supposedly non-technical canyon turned out to be at one section and luckily there was one bolt that saved us from having to contact SAR.

- Fixed anchors are an essential piece of climbers and canyoneers' safety system and are not prohibited "installations" under the Wilderness Act. Following existing climbing policies that allow judicious use of fixed anchors for more than a half century will do more to protect Wilderness character while providing for primitive and unconfined Wilderness climbing. Bolts have been used all across Europe for decades and yet their wilderness remains pristine and their climbers safe.

- Prohibiting fixed anchors would potentially make official rescues or self-rescues, where rescuers can rely on existing anchors and act faster, more difficult, or impossible.

- It is unreasonable for federal agencies to create new guidance policies prohibiting Wilderness climbing anchors across the country when they have allowed, managed, and authorized fixed anchors for decades.

- Prohibiting fixed anchors will create safety issues by imposing unnecessary obstacles to the regular maintenance of fixed anchors, a responsibility undertaken by the climbing community. Critical safety decisions often must be made in the moment and any authorization process should not impede those decisions. Fixed anchor maintenance needs to be managed in a way that incentivizes safe anchor replacement and does not risk the removal of climbing routes.

- Prohibiting fixed anchors obstructs appropriate exploration of Wilderness areas. Land managers need to allow climbers to explore Wilderness in a way that permits in-the-moment decisions that are necessary when navigating complex vertical terrain.

- Prohibiting fixed anchors will threaten America's rich climbing legacy and could erase some of the world's greatest climbing achievements. Climbing management policy needs to protect existing routes from removal.

- Restricting the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands is unenforceable and will create confusion amongst land managers and climbers. Non-Wilderness climbing management policy should maintain opportunities for new anchors unless and until analyses determine climbing should be restricted to protect cultural and natural resources.

I hope the USFS and climbing community can work together to make the wilderness more accessible to the public while also protecting it. Too much of the wilderness is already denied to the public with various closures for

unreasonable periods of time. NPS should be increasing access, not limiting it, so the public can pursue healthy activities. Putting the time and resources in educating the public on how to preserve the wilderness while using it would be a much more productive action.

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